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| Illinois Bell Telephone Company |) | - FDK'S NFFICE |
| |) | 02-0864CHIEF CLERK'S OFFICE |
| Filing to increase Unbundled Loop |) | |
| And Nonrecurring Rates |) | |

PETITION TO INTERVENE

International Brotherhood of Electrical Workers Local 21 ("Local 21"), by its attorneys Dowd, Bloch & Bennett, respectfully requests that it be permitted to intervene in this proceeding in accordance with the Commission's Rules of Practice. In support of its Petition to Intervene, Local 21 states as follows:

- Local 21 is the exclusive collective bargaining representative for nearly all
 of the non-management employees of Illinois Bell Telephone Company, also known as
 SBC Illinois.
- 2. Local 21 and its members may be affected by any order entered by the Commission in this proceeding, and it has an interest in the outcome of the above-captioned proceedings.
- 3. Local 21 administers a labor contract with SBC Illinois and is knowledgeable about the labor costs for all employees covered under the labor contract. At least one party to this proceeding has proposed to reduce the level of benefits included in the labor rates used in SBC Illinois' cost studies for UNEs. Local 21 has information that is relevant to this proposal that it desires to provide to the Commission.

Wherefore, Local 21 respectfully requests that its Petition to Intervene be granted.

Respectfully submitted,

Robert E. Bloch

Attorney for IBEW Local 21

Robert E. Bloch Dowd, Bloch & Bennett 8 S. Michigan Avenue 19th floor Chicago, IL 60603 312-372-1361

VERIFICATION

I, Robert E. Bloch, on oath, state that I am one of the attorneys for SBC Illinois, that I have reviewed the foregoing Petition to Intervene, and that, to the best of my knowledge, information and belief, the statements contained therein are true and correct.

Robert E. Bloch

Subscribed and sworn to before me

On January λ , 2004

ELSA I. CONTRERAS

Nótary Public, State of Illinois

STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

| Illinois Bell Telephone Company |) | 02-0864 |
|---|--------|---------|
| Filing to increase Unbundled Loop And Nonrecurring Rates |)) | |

NOTICE OF FILING

Please be advised that on January 21, 2004, I filed the attached Appearance, Petition to Intervene and Verification with the Illinois Commerce Commission.

Robert E. Bloch

CERTIFICATE OF SERVICE

I certify that I caused to the attached Appearance, Petition to Intervene and Verification, and Notice of Filing to be served on the parties identified on the attached service list by United States mail, postage prepaid, and/or by electronic transmission, on

January 21, 2004

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